

ORIGINAL

(23)

9-23-02
SC

UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA

JOHN D. PERKEY and
THERESA M. PERKEY,
Petitioners/Plaintiffs

v.

RELIABLE CARRIERS, INC.
DANIEL JOSEPH BEMBEN,
AND KENT,
Respondents/Defendants

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: CIVIL NO. 1:00-CV-1639
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: (MAGISTRATE JUDGE SMYSER) ✓
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FILED
HARRISBURG, PA

SEP 20 2002

MARY E. D'ANDREA, CLERK
Per Deputy Clerk

PETITION TO AMEND JOINT CASE MANAGEMENT ORDER

1.

The Petitioner is John D. Perkey, the Plaintiff in this action.

2.

The Respondent is Reliable Carriers, Inc., Daniel Joseph Bemben, and Kent.

3.

Counsel for the parties have reviewed the status of Discovery as well as the status of the underinsured motorists cases related to this case, and counsel believes that the changes to the Joint Case Management Plan would be appropriate.

4.

There is a good cause for said changes. Discovery will be expected to continue beyond September 30, 2002. The companion cases of Prudential Property v. John D. Perkey and Theresa M. Perkey at 1:CV-02-0819 and John D. Perkey v. Prudential Property & Casualty have been set for consolidation and are expected to be resolved in March 2003.

5.

The parties hereby request the following changes to the Case Management Order as follows:

Deadline for Discovery: November 30, 2002

Deadline for Expert Reports: December 15, 2002

Dispositive Motions: *January*
~~June~~ 15, 2003

Motion in Limine: February 3, 2003

Trial Date: March or April 2003

6.

E. Ralph Godfrey, Esq., counsel for the Respondent/Defendant, consents to the requested amendment as set forth herein.

WHEREFORE, the Petitioner/Plaintiff requests that the Court amend the Joint Case Management Plan Order as requested herein.

Respectfully submitted,

IRWIN, McKNIGHT & HUGHES

By: 

Marcus A. McKnight, III, Esquire
60 West Pomfret Street
Carlisle, Pennsylvania 17013
(717) 249-2353
Supreme Court I. D. No. 25476

Date: September 20, 2002

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

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CERTIFICATE OF SERVICE

I, Marcus A. McKnight, III, Esquire, hereby certify that on this date a true and correct copy of the foregoing document was served upon the attorney for Plaintiffs by first-class United States Mail, postage prepaid in Carlisle, Pennsylvania 17013, addressed as follows:

E. Ralph Godfrey, Esquire
GODFREY & COURTNEY, P.C.
P. O. Box 6280
Harrisburg, PA 17112
Attorney for Defendant

By:


Marcus A. McKnight, III, Esq.
IRWIN, McKNIGHT & HUGHES
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Dated: September 20, 2002